

Moses & Singer LLP
Lawrence L. Ginsburg (LG-6370)
Christopher J. Caruso (CC-8005)
The Chrysler Building
405 Lexington Avenue
New York, NY 10174-1299
Tel: 212-554-7800

Attorneys for ABN AMRO Bank N.V.

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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In re

PARMALAT FINANZIARIA S.p.A., et al.,

Debtors in a Foreign Proceeding.

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In a Proceeding Under Section
304 of the Bankruptcy Code

Case No. 04-14268 (RDD)

(Jointly Administered)

**ABN AMRO BANK N.V.'s DESIGNATION OF RECORD ON APPEAL AND
STATEMENT OF ISSUES TO BE PRESENTED**

ABN AMRO Bank N.V. ("ABN"), pursuant to Rule 8006 of the Federal Rules of Bankruptcy Procedure, hereby provides its (i) designation of items to be included in the record on appeal and (ii) statement of issues with respect to the Order Pursuant to Section 304 of the Bankruptcy Code Granting Permanent Injunction and Giving Effect to Composition in the United States (Docket No. 215), entered by the United States Bankruptcy Court for the Southern District of New York on July 20, 2007.

A. Designation of Record

The following items are to be included in the record on appeal:

1. 11 USC Section 304 Petition. of Parmalat Finanziaria S.p.A. (Docket No. 1)
2. Verified Petition in Support of the Commencement of Cases Ancillary to Foreign Proceedings Pursuant to Section 304 of the Bankruptcy Code and Motion for a Temporary Restraining Order and Preliminary and Permanent Injunctions and Related Relief Under Section 304(b) of the Bankruptcy Code (Docket No. 2)
3. Affidavit of Marcia L. Goldstein Pursuant to Local Bankruptcy Rule 9077-1, Federal Rule 65 and Bankruptcy Rule 7065 in Support of Petitioner's Motion for a Temporary Restraining Order and Preliminary and Permanent Injunctions and Related Relief Under Section 304(b) of the Bankruptcy Code (Docket No. 3)
4. Declaration of Francesco Gianni in Support of the Verified Petition of the Foreign Representative for the Commencement of a Case Ancillary to a Foreign Proceeding Pursuant to Section 304 of the Bankruptcy Code and Motion for a Preliminary and Permanent Injunction and Related Relief Under Section 304(b) of the Bankruptcy Code (Docket No. 4)
5. Memorandum of Law in Support of (I) Verified Petition for the Commencement of a Case Ancillary to Foreign Proceeding Under Section 304 of the Bankruptcy Code and (II) Motion for a Temporary Restraining Order and Preliminary and Permanent Injunctions and Related Relief Under Section 304(b) of the Bankruptcy Code (Docket No. 5)
6. Order to Show Cause signed on 6/24/2004 with Temporary Restraining Order, Establishing a Hearing with Respect to Preliminary and Permanent Injunctions and Related Relief (Docket No. 8)
7. Objection to Motion for Preliminary and Permanent Injunction and Related Relief under Section 304(B) of the Bankruptcy Code. (Docket No. 15)
8. Declaration of Cesare Vecchio and Giuseppe Curto in Opposition to the Motion for a Preliminary and Permanent Injunction and Related Relief under Section 304(B) of the Bankruptcy Code (Docket No. 16)
9. Petitioner's Response to the Objection of the Ad Hoc Committee of Noteholders to the Motion for Entry of Preliminary Injunction and Related Relief Under Section 304(c) of the Bankruptcy Code (Docket No. 20)
10. English Translation of Proposed Composition with Creditors (Docket No. 41)
11. Transcript of Hearing Held 6/22/04 (Docket No. 75)

12. Objection of Certain Noteholders to Extension of the Preliminary Injunction Order or, in the Alternative, Motion to Condition Extension on the Establishment of a US Claims Procedure (Docket No. 101)
13. Foreign Debtors' Response to the Objection of Certain Noteholders to the Extension of the Preliminary Injunction or, in the alternative, Motion to Condition Extension on the Establishment of a U.S. Claims Procedure (Docket No. 104)
14. Objection Of Arab Banking Corporation (B.S.C.) to Extension Of Preliminary Injunction Order (Docket No. 122)
15. Notice of (i) Filing of Proposed Form of Permanent Injunction Order Pursuant to Section 304 of the Bankruptcy Code and Memorandum of Law In Support Thereof, (ii) Hearing to Consider Request For Entry Of Permanent Injunction Order and (iii) Deadline to File Objections Thereto (Docket No. 146)
16. Objection of BankBoston, N.A., FleetBoston Financial, Bank of America Corporation, Bank of America NT&SA, Banc of America Securities LLC, and Bank of America, N.A. to Entry of the Debtors' Proposed Permanent Injunction Order Pursuant to 11 U.S.C. Sec.304 (Docket No. 157)
17. Objection of Israel Discount Bank of New York to Entry of Debtors' Proposed Permanent Injunction Order Pursuant to 11 U.S.C. 304 and Joinder In Objection Of BankBoston, N.A., et. al. (Docket No. 159)
18. Response of ABN AMRO Bank N.V. to and Joinder in Objection of Israel Discount Bank of New York to Entry of Debtors' Proposed Permanent Injunction Order Pursuant to 11 U.S.C. Section 304 (Docket No. 183)
19. Notice of (I) Filing Of Revised Proposed Form Of Permanent Injunction Order Pursuant to Section 304 of the Bankruptcy Code and (II) Hearing to Consider Request for Entry of Permanent Injunction Order (Docket No. 189)
20. Transcript of Hearing Held on February 27, 2007 at 10:37 AM, re: Hearing to Consider Entry of a Permanent Injunction Order; Objection of Certain Noteholders to Entry of the Permanent Injunction Order or Extension of the Preliminary Injunction Order; Statement (Docket No. 191)
21. Supplemental Memorandum of Law of Bank of America and BankBoston in Support of Their Objection to Entry of the Proposed Permanent Injunction Pursuant to 11 U.S.C. Section 304 (Docket No. 192)
22. Supplemental Objection of ABN AMRO Bank N.V. to Entry of Debtors' Proposed Permanent Injunction Order Pursuant to 11 U.S.C. Section 304 (Docket No. 193)
23. Declaration of Giuseppe Curto' with Exhibits A and B (Docket No. 194)

24. Foreign Debtors Response to the Objection Of Bank Of America and Joinder Of ABN-AMRO to Entry of the Permanent Injunction (Docket No. 197)
25. Declaration of Marcia L. Goldstein (Docket No. 198)
26. Foreign Debtors' Omnibus Response to Objections to Entry of the Permanent Injunction (Docket No. 199)
27. Surreply of Bank of America and BankBoston in Support of Their Objection to Entry of the Proposed Permanent Injunction (Docket No. 200)
28. Declaration of Bojan Guzina (Docket No. 201)
29. Sur-Reply of ABN AMRO Bank N.V. in Support of Its Supplemental Objection to Entry of Debtors' Proposed Permanent Injunction (Docket No. 202)
30. Transcript Of Hearing Held on June 21, 2007 at 2:04 PM, Re: to Consider Entry of a Permanent Injunction (Docket No. 214)
31. Order Granting Permanent Injunction and Giving Effect to Composition in the United States (Docket No. 215)
32. Notice of Appeal from the Order Pursuant to Section 304 of the Bankruptcy Code Granting Permanent Injunction and Giving Effect to Composition in the United States, entered on July 20, 2007 (Docket No. 215) (Docket No. 216)

B. Statement of Issues

1. Did the Bankruptcy Court abuse its discretion in granting permanent injunctive relief under 11 U.S.C. § 304?

Dated: New York, NY
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MOSES & SINGER LLP

By: /s/ Christopher J. Caruso
Lawrence L. Ginsburg (LG 6370)
Christopher J. Caruso (CC 8005)
The Chrysler Building
405 Lexington Avenue
New York, NY 10174-1299
Tel.: (212) 554-7800
Attorneys for Creditor ABN AMRO
Bank N.V